

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE FARFETCH LIMITED SECURITIES
LITIGATION**

Case No. 1:23-cv-10982-ER-KHP [rel.
1:24-cv-00532-ER]

CLASS ACTION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

STIPULATION AND ~~[PROPOSED]~~ ORDER REGARDING SCHEDULING

Co-Lead Plaintiffs Fernando Sulichin, individually and on behalf of Lyxor Overseas Holdings Ltd & Cinergy Advisors Ltd., and Yuanzhe Fu (“Co-Lead Plaintiffs”), and Defendants José Neves, Elliot Jordan, and Stephanie Phair (“Defendants,” and with Co-Lead Plaintiffs, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court enter the below Order approving this Stipulation:

WHEREAS, on February 6, 2024, this Court entered a stipulation and order providing that, among others, within 14 days of consolidation, “Defendants and Co-Lead Plaintiffs shall meet and confer regarding scheduling and shall submit a stipulation with the Parties’ proposed schedule for the filing of an amended complaint or the designation of the existing complaint as the operative complaint and the filing of an answer, motion, or other response to the complaint” (ECF No. 23 at 4-5);

WHEREAS, on February 13, 2024, this Court entered a stipulation and order providing that, among other things, “Co-Lead Plaintiffs shall file a Consolidated Complaint on or before April 8, 2024” (ECF No. 29 at 2) (emphasis in original);

WHEREAS, Co-Lead Plaintiffs have requested an extension of the April 8, 2024 deadline for the filing of a Consolidated Amended Complaint (“CAC”). Coupang Inc. (“Coupang”)

acquired Farfetch Limited's operating subsidiaries on January 30, 2024. Coupang will be providing additional information relating to the acquisition, including the preliminary fair value of assets acquired and liabilities assumed, in its quarterly filing on Form 10-Q which is expected to be released in mid-May 2024. Co-Lead Plaintiffs believe that this information will be highly relevant to their allegations and will be included in the CAC;

WHEREAS, Defendants do not agree that the views of this third-party are relevant to this case, but do not oppose Co-Lead Plaintiffs' request for extension; and

WHEREAS, the Parties have conferred and agreed upon a revised schedule for Co-Lead Plaintiffs to file a CAC, and have further agreed, subject to the Court's approval, to move directly to briefing on Defendants' anticipated motion to dismiss rather than filing the pre-motion letters provided for in Rule 2(A)(ii) of your Honor's Individual Practices.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, and respectfully requested, by and among the Parties and subject to the approval of the Court, as follows:

1. Co-Lead Plaintiffs shall file the CAC on or before June 7, 2024;
2. With the Court's permission, the Parties will proceed directly to briefing on Defendants' motion to dismiss the CAC rather than submission of pre-motion letters;
3. Defendants shall file their motion to dismiss on or before August 6, 2024;
4. Co-Lead Plaintiffs shall have until October 7, 2024 to file any opposition to any such motion; and
5. Defendants shall have until November 6, 2024 to file any reply brief in further support of their motion to dismiss.

-- Signatures on following page --

IT IS SO STIPULATED AND AGREED TO THIS 25th DAY OF MARCH 2024.¹

LEVI & KORSINSKY, LLP

/s/ Adam M. Apton

Adam M. Apton
33 Whitehall Street, 17th Floor
New York, NY 10004
Telephone: (212) 363-7500
Facsimile: (212) 363-7171
aapton@zlk.com

*Counsel for Lead Plaintiff Fernando Sulichin
and Co-Lead Counsel for the Class*

**HAGENS BERMAN SOBOL SHAPIRO
LLP**

/s/ Lucas E. Gilmore

Lucas E. Gilmore (admitted *pro hac vice*)
Reed R. Kathrein (*pro hac vice* forthcoming)
715 Hearst Avenue, Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
lucasg@hbsslaw.com
reed@hbsslaw.com

Steve W. Berman (*pro hac vice* forthcoming)

**HAGENS BERMAN SOBOL SHAPIRO
LLP**

1301 Second Avenue, Suite 2000
Seattle, WA 98101
Telephone: (206) 623-7292
Facsimile: (206) 623-0594
steve@hbsslaw.com

*Counsel for Lead Plaintiff Yuanzhe Fu and
Co-Lead Counsel for the Class*

LATHAM & WATKINS LLP

/s/ Jason C. Hegt

Jeff G. Hammel
Jason C. Hegt
Jooyoung Yeu
Andrej Novakovski
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Facsimile: (212) 751-4864
jeff.hammel@lw.com
jason.hegt@lw.com
jooyoung.yeu@lw.com
andrej.novakovski@lw.com

*Attorneys for Defendants José Neves, Elliot
Jordan, and Stephanie Phair*

¹ The signatories to this stipulation have consented to the use of electronic signatures in accordance with Rule 8.5(b) of the Court's ECF Rules and Instructions.

SO ORDERED this 25th day of March, 2024.

A handwritten signature in blue ink, appearing to read 'Edgardo Ramos', is positioned above a horizontal line.

Honorable Edgardo Ramos
United States District Judge